

~~WA 2917~~

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WA 2917

6/3/1988

RCRA COMPLIANCE
REGION 10

EPA INSPECTION REPORT SUBMITTAL SLIP

FILE COPY

I. Submitted By: A Boyd Date: 6/3/88

☒ Narrative

☒ Checklist(s)

☒ Photos

☒ Attachment(s)

☐ Comments

COMPANY NAME

ChemPro - P91

WAD... 2917

Insp of 9/28/87

No CMEL Attached prev. submitted

II. Date Reviewed: 6/29/88

Reviewed By: CR

Title: Chief, RCS

☒ Accepted ☐ Returned

III. Comments:

HUDMS corrections if rec.

IV. Route To:

① Bill A - review & rec. action

② File: RCRA Compliance

USEPA RCRA



3012783

Narrative Inspection Report

Facility: Chemical Processors, Inc. (Chem Pro)
ID No. WAD00812917
Address: Pier 91, Seattle Washington

Date of Inspection: September 28, 1987

Inspectors: A. Boyd, EPA - Seattle
J. Pankanin, EPA - Seattle
L. Ashley, DOE - Northwest

Report prepared by: Andrew Boyd *AB 5/3/88*
RCRA Compliance Section
EPA - Seattle

Purposes of the Inspection:

- (1) to assess compliance with applicable hazardous waste laws and regulations,
- (2) to provide field experience,

Introduction

The State of Washington Department of Ecology (DOE) hazardous waste program has been authorized by EPA, and operates in lieu of the federal program. However, EPA retains responsibility for administering requirements imposed by the 1984 amendments to RCRA. The facility is located on the Pier 91 compound, which is owned by the Port of Seattle.

General Facility and Process Information

The Chem Pro facility opened on 7/1/70 and operates primarily as a waste oil reclamation facility. Re-usable oil is reclaimed by separating impurities in tanks. Oil/water separation, phenol oxidation, precipitation of heavy metals, pH adjustment, and chromium reduction in the tanks are the methods described in the facility's Part A permit application. Waste is received from a number of sources, including petroleum refining, bilge water from barges and tankers, paint booth wastes, and contaminated water.

Notification and Permitting

Chem Pro submitted a Notification of Hazardous Waste Activity (form 8700-12) dated 8/13/80, received by EPA on 8/18/80. The notification indicated that the facility is a generator, transporter, and treatment, storage & disposal facility.

Chem Pro submitted a Part A application dated 11/14/80, received by EPA on 11/18/80. The Part A was revised on 7/23/82, and on 2/18/86. The revised Part A indicates that the facility treats and stores hazardous waste in tanks, and operates a centrifuge for dewatering solids and sludges. The facility reported a tank storage capacity of 9,036,090 gallons, and a tank treatment capacity of 40,000 gallons per day.

Facility Inspection - General

Photographs were taken by J. Pankanin.

Opening Conference

After meeting with Dennis Stefani, Manager of Regulatory Affairs, at the Chem Pro offices, we arrived at the Chem Pro Pier 91 facility at about 10:15 a.m. We were met there by Nate Matthews, Chem Pro Pier 91 Plant Manager.

I told Chem Pro officials that the purpose of the inspection was to assess facility compliance with applicable hazardous waste laws and regulations. I then questioned N. Matthews on facility operations. His descriptions of operations are summarized below. A more complete description of facility operations is contained in the report for the EPA inspection conducted on 7/15/86.

They receive waste oil for reprocessing and for blending, machine oils and coolants for treatment, and ballast, bilge and oily waste water for treatment.

Pacific Northern Oil is the outlet for their reprocessed oil. They operate alongside the Chem Pro facility, and use the oil as marine boiler fuel.

Treatment of wastes received includes precipitation and flocculation. Chemicals used in treatment include sulfuric acid, sodium hydroxide, ferrous sulfate, aluminum sulfate, and some polymers.

Tanks

The facility is comprised of what Chem Pro calls waste oil and waste water tanks. Tanks are covered and are located on concrete pads with concrete containment berms, except the 2 rectangular tanks alongside tank 112. Leak detection is visual and by gauging.

Security

The facility is located inside the Pier 91 compound. The Pier 91 Compound is surrounded by a fence 6 feet or more high and topped by barbed wire. To enter the compound, one must pass through a gate monitored by a guard. According to Chem Pro, a guard is on duty 24 hours a day. A number of other facilities and operations are also located inside the compound. There is also a roving security force at Pier 91.

Contingency Plan, Waste Analysis Plan, and Closure Plan

A copy of the facility Contingency Plan (dated 10/6/87), Closure Plan (dated 9/18/87), and Waste Analysis Plan (dated 9/26/86) was obtained by mail after the inspection. These plans have been referred to an EPA contractor for a separate evaluation and report.

Drum Storage

Approximately 26 waste drums were observed in the facility warehouse. They were not dated. The drums were said to contain tank sludges that had been returned by CSSI because of sulfide content. They were stacked together, without aisle space to allow for inspection of individual drums. Drums of tank sludges were also in storage outside, at the rear of the facility. The drums in this area were also stacked together, with no aisle space. These also included drums rejected by CSSI because of sulfide content. Chemical analyses of these wastes indicate total levels of 400 ppm lead, 38 ppm cadmium, and 160 ppm chrome (see attached report of chemical analyses). These levels exceed 40 CFR Section 261.24 regulatory levels, but the testing was not pursuant to EP Toxicity procedures. The facility Part A does not provide for container storage.

Tanks

Tanks were inspected. All waste and sludge tanks were on concrete floors, and within bermed areas. All were covered and there were no apparent leaks. N. Matthews indicated that all sumps at the facility run to the oil/water separator.

There are 2 open tanks outside the bermed areas. They are alongside tank 112. They are used for flocculation and for treatment of wastes containing phenols.

The facility has an oil/water separator pit. It is recessed and has a metal grate over the top of it. Oily water loads are discharged to it. The facility has large screener baskets for filtering the material in the oil water separator pit.

Closing Conference

A short closing conference with facility representatives was conducted. The facility was advised that drums should be organized to allow for inspection of each drum, and that training for new employees is required to be provided within 6 months of employment.

Findings

Specific findings appear above and on the attached checklist. Facility RCRA plans have been referred to contractors for review and evaluation. Due to my transfer from the RCRA Compliance Section, an abbreviated report has been prepared. The checklist (page I-1) contains a summary of findings.

RESOURCE CONSERVATION AND RECOVERY ACT (RCRA)

Region 10 Inspection Checklist

Purpose--This checklist is designed to serve as a guideline to the major points of the regulations adopted pursuant to RCRA for inspectors to use while visiting hazardous waste (HW) regulated facilities. This checklist should not serve as a substitute for a detailed knowledge of the relevant regulations. The following is the outline of the checklist.

- I. General Information
- II. Small Quantity Generator (SQG) Regulations (40 CFR 261.5)
- III. Generator Regulations (40 CFR 262)
- IV. Transporter Regulations (40 CFR 263)
- V. Treatment, Storage, and Disposal (TSD) Interim Status Regulations (40 CFR 265)
- VI. Treatment, Storage, and Disposal (TSD) Permit Status Regulations (40 CFR 264)

I. General Information (Date Revised November 21, 1983)

A. Date/Time Inspection commenced: 9/28/87

B. Facility

EPA/State ID WADCCC0512917

Name & Addresses Chemical Processors Inc. - Pier 91 Facility

1. Mailing: 2203 Airport Way South - Suite 400 - Seattle, WA 98134

2. Location: Pier 91
Seattle, Washington

Contact: Dennis Sklar - Mgr of Reg. Affairs / Natl Mathews
Telephone: (206) 223-0500 Plant Mgr

C. Compliance Summary	IN	OUT	N/A
RCRA (Statute)	()	()	()
40 CFR 270	()	()	()
40 CFR 124	()	()	()
40 CFR 261.5	()	()	()
40 CFR 262	()	()	()
40 CFR 263	()	()	()
40 CFR 264 (Permit)	()	()	()
40 CFR 265	()	()	()

Specific Violations: 262.11 - inadequate hazardous determination for sludge;
262.23 - deficient manifest; 265.13 - failure to obtain detailed analyses for all
wastestreams; 265.15 - insp. logs don't include time; 265.16 - deficient
training program; 265.147 + 265.143 - language of financial documents
differs from that required; 280.3 - failure to notify state if oil/water
separation is an underground tank

D. Inspector

Name (Print) Andy Boya

Title: EPS

Signature [Signature]

Organization EPA - R-10

Phone 442-1880

E. Inspection Participants:

Name	Title	Phone #
L. Ashley	WDOE	
Tim Parkman	EPA - ESD	
Red Atwood	Chem Pro -	
Mark Matthews	Pier 91 Plant Mgr	
Susan Dondanville	Chem Pro Permit App. writer	
Keith Lorch	" "	
Peter Kessler	" "	

F. Notification/Permit Information

1. Started operation: Site originally developed and used by Texaco in 1920s Date: 1971
2. Notification filed: YES NO Date: sec'd 8/19/80
3. Part A application filed: YES NO Date: 11/18/80
4. Part B called/Date Due YES NO Date: not called
5. Part B application: YES NO Date: N/A
6. Changes in Notification or Part A: Part A revised 7/23/85, Also revised Part A submitted to State - 2/15/86
7. Facility's classified as: added to - Part A does not include container storage
 - Generator ☒
 - Transporter ☐
 - Treatment facility ☒
 - Storage facility ☒
 - Disposal facility ☐
 - Small quantity generator ☐
 - Recycler ☐
 - Less than 90 day storage ☐
 - Wastewater treatment unit exemption (WWTU) ☐
 - Elementary neutralization unit exemption (ENU) ☐
8. Does facility have a Part A withdrawal request in ? YES NO

Status _____

Comments: _____

G. Hazardous Waste Generation (HW) and Management (List EPA Waste Code)

Part A

1. General information

a. Characteristic HW (DXXX)?

- (1) Ignitability D001
- (2) Corrosivity D002
- (3) Reactivity D003
- (4) EP Toxicity D004 - D011

b. Listed HW?

- (1) HW from non-specific sources (FXXX)
(F017 & F018 not on revised Part A)
- (2) HW from specific sources (KXXX)
K049, K050, K051, K052, (K048 - added 2/18/86)

c. Discarded commercial chemical product (PXXX or UXXX)

- (1) PXXX P110
- (2) UXXX U188, U051, U052, U053, U117

d. Has facility petitioned to delist waste? YES ☒ NO

Date: _____ Comments: _____

e. Does facility qualify for WWTU or ENU? YES ☒ NO

Comments: WWTU tanks - discharge to METRO POTW
 pursuant to pretreatment permit

f. Has a determination been made for each waste generated that it is or is not a RCRA hazardous waste?

- (1) What are the wastes generated? Tank Sludges
- (2) How was the hazardous waste determination made for each waste (i.e., lab analyses, knowledge of waste streams or processes, waste listed in Part 261)?

Comments: Classified as stark Dangerous waste -
inadequate testing to determine haz. waste status -
see narrative

(3) Are records available on the determination(s)?

YES ☒ NO

inadequate
- no EL Tox
testing - total levels
exceed regulatory
levels for
lead, cadmium
& chromium

(4) Are all hazardous wastes noted during inspection listed on the facility's RCRA notification/ Part A application?

YES

NO

If so explain.

2. Specific information
Provide the following information for each of the individual HW streams listed above. (Complete a separate form for each HW.)

- a. EPA HW Code
- b. HW description
- c. Composition (including sampling requirements)
- d. Process producing waste:
- e. Rate of waste production
- f. Time of storage
- g. Waste handling prior to disposal
- h. Waste disposal practice and manifest
- i. Reporting and recordkeeping
- j. Comments

H. Miscellaneous Notes:

II. Small Quantity Generator (SQG) Regulations 40 CFR 261.5 (Date Revised November 21, 1983)

A. General

1. Has the generator ever accumulated more than 1000 kilograms of D, F, K or U coded HW or 1 kilogram of P coded HW [261.5(f)]? YES NO

- a. If yes, generator must comply with the generator regulations (262) and if stored for more than 90 days the applicable TSD regulations. Refer to Generator and/or TSD inspection checklist.

B. Small Quantity Generator (SQG) Regulations

1. A SQG must determine if he generates a hazardous waste (262.11). YES NO

2. Which of the following describes the SQG's treatment and/or disposal of his HW?

- a. occurs on-site YES NO

- b. ensure delivery to an off-site facility, either of which is:

- (1) permitted under Part 270 YES NO

- (2) in interim status under Part 270 and 265 YES NO

- (3) authorized to manage HW by an authorized state YES NO

- (4) permitted, licensed or registered by a State to manage municipal or industrial solid waste; or YES NO

- (5) (a) facility which

- (a) beneficially uses, re-uses recycles or reclaims his HW YES NO

- b. treats his waste prior to use, re-use, recycle, or reclamation YES NO

3. Does generator manifest his wastes (not required)? YES NO

III. Generator Regulations 40 CFR 262 (Date Revised November 21, 1983)

- A. Is the facility or does facility claim to be a small quantity generator?

YES ☒ NO

Comments: _____

- B. Does generator transport its own waste?

YES ☒ NO

1. If NO, what is contractor's EPA ID, name, address, and phone?

Safety-Klean Corp. TLD 051060408
Resource Recovery WAD 0616 72812

2. If YES, see Transporter Regulations (Section III).

- C. Does generator use the manifest system?

YES ☒ NO

1. Does the Generator ever offer his hazardous waste to transporters or to TSD facilities which do not have an EPA ID number?

YES ☒ NO

What transporters or TSD facilities?

not indicated during insp.

2. A generator transporting or offering for transport hazardous waste for off-site TSD must first prepare a manifest.

3. If the waste is undeliverable to the primary or alternate facility, the generator must either designate another alternate facility or instruct the transporter to return the waste.

Does the manifest contain the following information:

For manifest checked - see attached

- a. Manifest document number

YES ☒ NO

- b. Generator's name, mailing address, phone number, and EPA ID number

YES ☒ NO

- c. Name and ID number of each transporter

YES ☒ NO

- d. Name, address and EPA ID number of the designated and alternate TSD facilities, if any.

YES ☒ NO

- e. Description of waste(s) required by DOT regulations in 49 CFR 172.101, 172.202, 172.203.

YES ☒ NO

Safety Klean ID #
used for facility id
Washington phone - 206 -
775-7030 - appears
to be in error -
see attached
manifest # 75093

Ship spent parts
cleaner to Safety Klean
1 drum every week on
SO

Ship oil + tank bottom
solids to CSSI - Arlington, VA

except
incomplete mailing
address - manifest #
75093

see above (BX1)

except

- Proper shipping name ☒ YES ☐ NO
- Hazard Class ☒ YES ☐ NO
- Identification number ☒ YES ☐ NO
- f. Total quantity of each hazardous waste by units of weight or volume and type and number of containers placed aboard transport vehicle. ☒ YES ☐ NO
- 4. Does the manifest contain the certification attesting to proper classification, description, packaging, labeling, marking and condition in accordance with DOT and EPA regulations? ☒ YES ☐ NO
- 5. Does the manifest contain an adequate number of copies to provide one copy for:
 - a. Generator's records ☒ YES ☐ NO
 - b. Records of each transporter ☐ YES ☐ NO
 - c. TSD facility owner or operator's records ☐ YES ☐ NO
 - d. Signature by each transporter and return to generator ☒ YES ☐ NO
 - e. Signature by TSD facility and return to generator ☒ YES ☐ NO
- 6. Does the generator use the manifest properly by:
 - a. Signing the certification ☒ YES ☐ NO
 - b. Obtaining signature and date of acceptance from initial transporter ☒ YES ☐ NO
 - c. Retaining one copy of the transporter's signed manifest for 3 years or until receipt of a signed copy from disposal facility ☒ YES ☐ NO
 - d. Giving transporter the remaining copies of the manifest ☐ YES ☐ NO
- 7. Does the generator contact the transporter and/or the designated TSD facility to determine the shipment status in the event that a signed copy from the designated facility has not been received within 35 days? ☐ YES ☐ NO

not determined

"

not determined

*Hasn't occurred
Mr. Matthews did
indicate no procedure
for checking to insure
receipt within 35 days*

- 7/A

9. The Manifest Exception Report must include

- ***** TSD FACILITIES SKIP TO MODULE V *****

- YES NO

- YES NO

- YES NO

- YES NO

- YES NO

- YES NO

- YES NO

- YES NO

- YES NO

- YES NO

- YES NO

- e. If yes, approximately how many? 1000000

V. TREATMENT, STORAGE and DISPOSAL (TSD) Interim Status Regulations
Facilities, 40 CFR 265. (Date Revised November 21, 1983)

A. Type of Activity

1. Storage

- a. Containers
- b. Tanks
 - (1) Above ground
 - (2) Below ground
- c. Surface Impoundments
- d. Waste Piles
- e. Other

() — not on Part A
() — see (V)(E)
()
()
()

2. Treatment

- a. Settling
- b. Evaporation
- c. Filtration
- d. Energy Recovery
- e. Incineration
- f. Thermal Treatment
- g. Recycling/Recovery
- h. Chem/Phys/Biological
- i. Other

()
()
()
()
()
()
()
()
()

3. Disposal

- a. Landfill
- b. Land Treatment
- c. Surface Impoundment
- d. Incineration
- e. Other

()
()
()
()
()

4. Comments:

5. Are hazardous wastes accepted from "outside" (off-site) sources (wastes not generated on site)? YES NO

- a. If YES, has a chemical and physical analysis of a representative sample been obtained in accordance with 40 CFR 265.13? YES NO

- b. Does the facility confirm that each hazardous waste received at the facility matches the identity of the waste on the manifest? YES NO

- c. How does the facility determine this?

with verification analyses —

B. Subpart B - General Facility Standards (40 CFR 265.10 - 265.17)

The Waste Analysis Plan exempts certain waste streams without a prior waste profile - rely on historical knowledge of waste + processes generating the waste - do perform verification analysis or receipt - see attached documents. No waste profile sheets provided / verification analyses were performed - except for waste from Trans Chemical NW where a profile was provided.

1. Does the facility obtain a detailed analysis of his waste prior to storing, treating, or disposing of it?

Describe: *waste loads examined not characterized by generation as hazardous waste - inadequate info. provided - to determine if these materials were hazardous waste* YES NO

2. Does the facility follow a Written Waste Analysis Plan
Does the Plan include?

- a. Parameters to be tested? YES NO
b. Methods of analysis? YES NO
c. Methods to get representative samples? YES NO
d. Testing frequency? YES NO

Comments:

Waste Analysis Plan dated 9/18/87 referred to EPA contractor for Evaluation

3. Did inspector collect a copy of the Plan for a thorough review of it at EPA's offices? YES NO

4. Security

- a. Have site owner/operators taken appropriate measures to ensure against unauthorized entry? YES NO

See Below

- (1) Are signs posted at each entrance to active portion, and at other locations, in sufficient numbers to be seen by an approach? YES NO

- (2) Are they legible from a distance of 25 feet or more? YES NO

- (3) Does the facility have a 24-hour surveillance system or artificial or natural barrier/or combination of both, to control access to the active portion? YES NO

Comments:

with other facilities. The facility is within a fenced compound (Pier 91) its own fence - Pier 91 reportedly provides 24 hour security for the Pier 91 compound

5. Does the facility follow a Written Inspection Schedule (40 CFR 265.15)? YES NO

undated

- a. Does it include inspecting all:
Monitoring equipment?
Safety and emergency equipment?
Security devices?
Detecting equipment?

YES NO
YES NO
YES NO
YES NO

Dangerous waste storage areas?

YES NO

2. Containment areas - monthly safety training weekly

b. Is this inspection schedule maintained at the facility?

YES NO

c. Is an inspection log maintained?

YES NO

(1) Is the log, or its summary, kept at the facility for at least three years from the date of inspection?

YES NO

(2) Does the log include:

(a) date of time of inspection? YES NO

Date - but not the time

(b) inspectors name? YES NO

(c) observations? YES NO

No records for container storage

(d) date and nature of repairs? YES NO

Comments:

leakage coils - tank 107
no indication of repairs

6. Personnel Training (40 CFR 265.16)

a. Has a training program been developed? What Type? (Classroom/on-the-job)

YES NO

According to P. Resistor - in process of revising most training is OJT

b. Does the program include contingency plan and response training?

YES NO

c. Does the program include measures to familiarize personnel with emergency response equipment, procedures, and systems including:

YES NO

little detail as how

(1) Procedures for using and maintaining equipment?

YES NO

what topics will be covered

(2) Key parameters for automatic waste feed cut-off systems.

YES NO

(3) Communications or alarm equipment

YES NO

(4) Response to fire and explosions

YES NO

(5) Response to ground water contamination incidents?

YES NO

not specifically addressed

(6) Facility shut down?

YES NO

d. Are records available at the facility for the following:

(1) Job title for each position related to hazardous waste management and maintaining equipment?

YES NO

(2) Written job description for each job title?

YES NO

(a) Does the job description include the skill, education or qualifications required for the position

YES NO

(b) The duties assigned to that position?

YES NO

(3) A written description of the type and amount of training to be given to those in each job position?

YES NO

(4) A record of training completed or experience obtained for each job position by employee

YES NO

(5) Was the required training obtained within 6 months of employment or by May 19, 1981, by each individual involved in hazardous waste management activities?

YES NO

See Attached Records - records include results of tests/procedures

2 expert mmt not

Not for all positions not available for Duckman, Foreman, Prop. mmt, mmt

Examined Records for 4 employees see below

Not in All cases see below

J. Edmondson - hired 5/24/87 - trained 7/29/87

J. Nelson - tested in 83 & 85 - hired 6/17/79 - reg. trainings provided 7/20/79 → 10/31/81 (Chemical trained safety procedures not provided till 10-31-81)

D. Carroll - hired 9/24/85 - record of training in emergency procedures, provided after 6/86 - more than 6 months after hiring -

C. Light - hired date - not provided; training provided 9/13/83

C. Subpart C - Procedures and Preventions (40 CFR 265.30)

1. Is facility maintained and operated to minimize the hazards of fire, explosion, and sudden or non-sudden releases to the environment?

YES NO

Explain:

2. Is internal emergency communication equipment or alarm systems installed?

YES NO

What type?

Air horns available -
use 2 way radios to communicate
with individuals in toxic form area

No yard alarm
on intercom

3. Is a device (e.g., telephone) immediately available for summoning emergency assistance?

YES NO

4. Are fire extinguishers or other emergency equipment immediately available on-site?

YES NO

fire fighting foam system -

5. Is emergency communications and response equipment tested?

YES NO

How often?

foam system tested weekly -
Fire Dept. annual inspection -
Fire extinguishers recharged quarterly -

6. Is aisle space adequate for emergency response?

YES NO

What is the aisle spacing?

Drums of sludge in storage
stacked together w/out aisle space
outside at rear of facility -

7. Have any arrangements been made with local emergency response organizations?

YES NO

Seattle Fire Dept. Ecology

8. Which organizations?

O.S.C.O., Metro

Nature of
arrangements not
described -

see
10/6/87
contingency
plan

9. If local organizations have declined to enter into response agreements, is this documented in the facility's operating record?

YES NO

N/A

Explain

C. Subpart C - Procedures and Preventions (40 CFR 265.30)

1. Is facility maintained and operated to minimize the hazards of fire, explosion, and sudden or non-sudden releases to the environment? YES NO
Explain:
2. Is internal emergency communication equipment or alarm systems installed? YES NO
What type?
3. Is a device (e.g., telephone) immediately available for summoning emergency assistance? YES NO
4. Are fire extinguishers or other emergency equipment immediately available on-site? YES NO
5. Is emergency communications and response equipment tested? YES NO
How often?
6. Is aisle space adequate for emergency response? YES NO
What is the aisle spacing?
7. Have any arrangements been made with local emergency response organizations? YES NO
8. Which organizations?
9. If local organizations have declined to enter into response agreements, is this documented in the facility's operating record? YES NO
Explain

D. Subpart D - Contingency Plan and Emergency Procedures 40 CFR
265.50

1. Has contingency plan been developed?
(It may be a modified SPCC plan)

YES NO

revised
10/6/87

2. Have incidents occurred where the plan
has been implemented?

YES NO

According to
J. Matthews

3. Have incidents occurred where the plan
should have been implemented but was not

YES NO

Explain

Not as best
as could be determined

4. A copy of the plan should either be
obtained for post-inspection office
review or it should be examined during
inspection for the following:

Plan referred to
Contractor for
evaluation

a. Does the plan describe actions to
be taken by personnel in response to
fire, explosion, or releases to the
environment?

YES NO

b. Does the plan describe arrangements
made with external emergency response
organizations?

YES NO

c. Does the plan list those qualified to
act as emergency coordinator including
their name, address, and phone?

YES NO

(1) Is the list current?

YES NO

d. Is all emergency equipment available at
the facility listed in the plan?

YES NO

(1) Is the location and a description of
the equipment included?

YES NO

(2) Are capabilities described for each
piece or equipment unit?

YES NO

e. Does the plan include evacuation proce-
dures including a description of signals to
initiate evacuation (and routes and
alternative routes)?

YES NO

f. Is a copy of the plan maintained at the active facility (versus main office)?

YES NO

(1) Has a copy been supplied to appropriate off-site emergency response organizations?

To which?

except - does not include hospital or medical facility

YES NO

5. Is at least one designated person always available to respond to emergencies (i.e., of those on the coordinator list)?

YES NO

How are they available

on call - answers service during off hours
no assurance of availability

6. What are the limits of this person's authority to respond to emergencies?

a. Has an emergency occurred?

YES NO

b. Was the plan implemented?

YES NO

c. (Describe the incident)

Acc. to Chem Pro
has response contact
w/ Crowley
End.
can activate hot
contact for
response

E. Subpart E - Manifest System, Recordkeeping, and Reporting 40
CFR 265.70

Most material shipped to the facility was not manifested - waste oil destined for reclamation

1. **Manifest System**

For manifests reviewed - see attached records

a. Upon receipt of a manifested hazardous waste shipment, does the TSD facility:

(1) Sign and date each copy of manifest receipt of certifying waste? ☒ YES ☐ NO

(2) Note any discrepancies on each copy? ☒ YES ☐ NO

(3) Give delivering transporter one signed and dated copy of the manifest? ☐ YES ☐ NO

not determined

(4) Send a S/D copy of the manifest to the generator within 30 days after delivery and? ☐ YES ☐ NO

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(5) Retain a copy of each manifest at the facility for 3 years from delivery? ☒ YES ☐ NO

b. If the TSD facility initiates a hazardous waste shipment, does it comply with generator requirements in Part 262? ☒ YES ☐ NO

see Part III this checklist

c. Does the TSD facility examine manifests and wastes received to detect any significant discrepancies in quantity or type of waste, such as: ☒ YES ☐ NO

(1) Bulk waste-quantity variation of 10 percent or greater

(2) Batch waste - any variation in piece count

(3) Waste type - obvious differences discernible by inspection or waste analysis

d. If significant discrepancies are found, does the TSD facility:

None identified

(1) Reconcile discrepancies with generator or transporter within 15 days? or ☐ YES ☐ NO

- (2) Immediately submit to EPA-RA a Discrepancy Report describing the discrepancy and attempts to resolve it and a copy of the manifest involved?

YES NO

- e. TSD facilities must keep a written operating record documenting the following details:

- (1) Waste description and quantity received
(2) Methods and dates of its treatment, storage, and disposal
(3) The location and quantity of each HW at the facility

see 2(b) below

2. Operating Record

- a. Does the owner/operator of the facility maintain an operating record at the facility (40 CFR 265.73)?

YES NO

- b. Does the record contain the following information.

- (1) A description of, and the quantity of each HW received, and the method(s) and date(s) of its treatment, storage, or disposal at the facility?

use daily activity logs

YES NO

- (2) The location of each Hazardous Waste within the facility, and its quantity?

YES NO

- (3) A map showing disposal sites?

YES NO

N/A no disposal on site

- (4) Summary reports and details of all incidents that require implementing the Contingency Plan?

YES NO

N/A not implemented to date

- (5) Records and results of inspections as required (need only be kept three years)?

YES NO

- (6) All closure and post-closure cost estimates required for the facility?

YES NO

- (7) The results of testing and waste analysis?

YES NO

3. Facility Reporting Procedures

- a. Has the owner/operator prepared and submitted a single copy of the Annual Report to EPA by March 1 of each year? *Wrote* YES NO *See Encluse Insp. Report for 6/22/87 inspection*
- b. Is owner/operator familiar with procedures for emergencies? YES NO *Answers to be*
- c. If a TSD facility accepts a regulated hazardous waste shipment without the required manifest or shipping paper, does it file an "Unmanifested Waste Report" within 15 days or receipt? YES NO *N/A*

F. Subpart F - Ground-Water Monitoring (40 CFR 265.90)

1. Are ground-water (GW) monitoring regulations required at this facility? YES NO

2. If YES, what is the relevant process unit?

- a. Surface impoundment
 - b. Waste pile
 - b. Land treatment
 - c. Landfills
 - d. Other
- Describe:

()
()
()
()
()

*NA
No disposal
at the site indicated*

3. Has the owner/operator implemented a ground water monitoring plan? YES NO

4. If NO, has the facility implemented one of the following:

- a. GW Waiver [265.90(c)] ()
- b. Alternate GW Monitoring System [265.90(d)] ()
- c. Neutralization Waiver (265.90(e)) ()
- d. Describe:

5. Does the ground water monitoring program consist of the following:

- a. At least 1 upgradient and 3 downgradient wells? YES NO
- b. GW Sampling and Analysis Plan YES NO
- c. GW sampling quarterly first year YES NO
- d. GW sampling semiannually after that YES NO
- e. Drinking Water Standards parameters YES NO
- f. Sampling frequency _____ YES NO
- g. GW Quality parameters YES NO
- h. Sampling frequency _____ YES NO
- i. GW Indicator parameters YES NO
- j. Sampling frequency _____ YES NO
- h. GW elevation parameters YES NO
- i. Outline GW Quality Assessment Program YES NO
- j. Statistical Analysis of Indicator parameters YES NO

Results:

6. Has the facility implemented GW Quality Assessment program. YES NO
- a. Date: _____
- b. Results: _____
7. Does the facility maintain the necessary records.
- a. Initial background parameter concentrations YES NO
- b. Subsequent parameters concentrations YES NO
- c. Statistical evaluations YES NO
8. Has the facility reported necessary information
- a. DW Standards for 1st year YES NO
- b. GW Indicator parameters annually YES NO
- c. Statistical evaluation YES NO
9. Comments:

G. Subpart G - Closure and Post-Closure (40 CFR 265.110)

Closure

*Closure Plan
referred to
Contractor for
evaluation*

1. - Has the facility developed a closure plan which outlines all necessary steps to safely close the facility? (40 CFR 265.117) *Closure Plan developed - dated 9/15/87*
 - a. Description of how and when the facility will be partially closed (if applicable) and finally closed? YES NO
 - b. Estimate of the maximum inventory of wastes in storage and in treatment at any time during the life of the facility? YES NO
 - c. Description of the steps needed to decontaminate the facility equipment during closure? YES NO
 - d. Comment:

Post-Closure

N/A no disposal indicated

2. Has the facility developed a post-closure plan which contains the following steps to safely care for the facility after closure/post-close of the facility? (40 CFR 265.117)
 - a. Description of how post closure will be carried out for the next 30 years. () ()
 - b. Notice to the local land authority within 90 days after closure is completed? () ()
 - c. Notice in deed to property? () ()

H. Subpart H - Financial Requirements 40 CFR 265.140

1. Liability

- a. (1) Does facility maintain liability insurance for sudden occurrences in the amount of at least \$1 million per occurrence with an annual aggregate of at least \$2 million? YES NO
- (2) By what method did the owner/operator demonstrate sudden liability coverages to the RA?
- (a) If HW facility liability endorsement(s) ()
- (b) If HW facility certificate(s) of liability insurance (✓)
- (c) financial test ()
- (d) corporate guarantee ()
- (e) multiple mechanisms (specify) ()

2. If a surface impoundment, landfill, or land treatment exist at the facility,

- b. (1) does facility maintained liability insurance for nonsudden occurrence in the amount of at least \$3 million per occurrence with an annual aggregate of at least \$6 million? YES NO
- (2) By what method did the owner/operator demonstrate non-sudden liability coverage to RA?
- (a) HW facility liability endorsement(s)' ()
- (b) HW facility certificate(s) of liability insurance' ()
- (c) financial test ()
- (d) corporate guarantee ()
- (e) multiple mehcanisms (specify) ()

NA
not an
CDF

- c. Has owner/operator submitted an originally signed duplicate of liability coverage demonstration to RA?
- d. Is wording of liability coverage instruments identical to that specified in 40 CFR 264.51?

264.151(j)

YES NO

Comment:

See attached copy in insp. file for 7/87 Chem Bldg - Lucille St. inspection language changes made to comply with WAC 173-303-400 & 303-620(10)

2. Assurance

however, - used "WDOE" - rather than "Department"

a. Closure

- (1) Has facility prepared a written estimate of the cost of closing the facility in accordance with the closure plan (40 CFR 265.112)? YES NO
- (2) Is this cost estimate adjusted annually for inflation? YES NO
- (3) Has facility established financial assurance for the closure of the facility (40 CFR 265.143)? YES NO

(4) By what method has this been achieved:

- (a) Trust fund ()
- (b) Surety bond (with standby trust) ()
- (c) Letter of credit (with standby trust) ()
- (d) Insurance ()
- (e) Financial test ()
- (f) Corporate guarantee ()
- (f) Multiple mechanisms ()

- (5) Has facility submitted an originally duplicate of financial assurance to RA? YES NO

- (6) Is wording of the financial assurance statement identical to that specified in 40 CFR 264.151 YES NO

(7) Comment:

b. Post-Closure (Disposal Facilities)

- (1) Has facility prepared a written estimate of the cost of post-closure monitoring and maintenance of the facility (40 CFR 265.144)? YES NO
- (2) Is this cost estimate inflation adjusted annually YES NO

Referred to Contractor for Evaluation

Trust Agreement has been revised to conform to Washington State requirements Revised Agreement available WDOE + EPA correspondence

N/A not an Lof

(3) Has owner/operator established financial assurance for the post-closure care of the facility (40 CFR 265.145)? YES NO

(4) By what method has this been achieved:

- | | |
|---|-----|
| (a) Trust fund | () |
| (b) Surety bond (with standby trust) | () |
| (c) Letter of credit (with standby trust) | () |
| (d) Insurance | () |
| (e) Financial test | () |
| (f) Corporate guarantee | () |
| (g) Multiple Mechanisms | () |

8. Has owner/operator submitted an originally signed duplicate of financial assurance to Regional Administrator? YES NO

9. Is wording of the financial assurance statement identical to that specified in 40 CFR 264.151? YES NO

*See
Comments
ABOVE*

I. Subpart I Use and Management of Containers (40 CFR 265.170)

Facility's
Part A -
does not include
container
storage

1. Does this section apply to this facility?

YES NO

if sludges
in the containers
are hz. waste -
treated at facility
as hz. waste

2. Are the containers made of or lined with materials which will not react with and are compatible with the hazardous waste to be stored in them?

YES NO

Appears to be
stored outside
(some rusting)

3. Are the containers always closed, except to add or remove waste?

YES NO

4. Are container storage areas inspected weekly for leaks and container deterioration (40 CFR 265.174)?

YES NO

No record
provided

5. Are precautions taken to prevent accidental ignition or reaction of ignitable or reactive waste?

YES NO

6. Are containers holding ignitable or reactive waste located at least 50 feet from the facility's property line?

YES NO

7. Is the facility aware of and complying with the following requirements for incompatible wastes:

No incompatible
wastes observed

a. Incompatible wastes must not be placed in the same containers, unless in compliance with 265.17(b)

YES NO

b. HW must not be placed in an unwashed container that previously held an incompatible waste

YES NO

c. Are storage containers holding HW that are incompatible with any waste or other material stored nearby separated from or protected from them by means of a dike, berm, wall, or other device?

YES NO

Explain?

8. Are containers marked or labeled in a manner equivalent to 40 CFR 172 subpart E?

YES NO

Not
definitely

9. Comments:

Not
dated

J. Subpart J - Tanks (40 CFR 265.190)

1. Does this section apply to this facility? YES NO

2. - Do tanks on the facility hold hazardous waste? YES NO

If so, what are their contents?

Residual sludges -

3. Is storage in tanks conducted such that:

a. It does not generated heat, pressure, fire, explosion or violent reaction?
(If no, explain) *except - some tanks have steam coils - part of treatment.* YES NO

b. It does not produce uncontrolled toxic mists, fumes, dusts, or gases?
(If no, explain) YES NO

c. It does not produce uncontrolled flammable fumes or gases? YES NO

d. It does not damage the tank? *no damage observed* YES NO

e. It does not threaten the environment in other ways (i.e., leaks, spills)? YES NO

Comments:

no leaks or spills observed - secondary tanks have containment

4. Is 2 feet of freeboard maintained in uncovered tanks? *Tanks covered w/ vents* YES NO

If no, is secondary containment used? YES NO

(Explain)

is secondary containment - concrete bermed area - except for rec. tank

5. Is the tank(s) continuously fed? YES NO

If yes, is there a means to stop inflow? YES NO

Explain

N/A

6. Are Hazardous Waste storage tanks operated in a manner which minimizes the possibility of overfilling? YES NO

How:

Waste feed cut-off ()

Bypass system to another tank ()

High level alarm ()

Other Gauging - record keeping -

7. Are inspections of the following conducted:

- a. Discharge control equipment?
How often? *weekly* YES NO
- b. Waste feed cut-off systems?
How often? *N/A* YES NO
- c. Data from tank monitoring equipment?
How often? *Tank gauge - daily or as needed* YES NO
- d. The level of waste in the tank?
How often? *see above* YES NO
- e. The structural integrity of tank?
How often? *weekly*
How are inspections conducted? *visual*
What is observed (looked for)? *see attached 1055 -* YES NO
- f. The immediate area around the tank for signs of leaks and the integrity of secondary containment (if any)? YES NO

8. Have any tanks once used for storage of hazardous waste been closed or their function changed? When?

- a. Were all hazardous wastes and/or residues removed? *see attached certification 7/14/86* YES NO
- b. What was the disposition of the wastes or residues (i.e., where did it go)? YES NO
- c. When shipped? *not determined* YES NO

9. Are ignitable or reactive wastes placed in tanks?

YES NO

10. If yes, what measures are used to prevent ignition or reaction?

No such indication

11. Have wastes been placed in a tank which previously contained potentially incompatible waste or residue?

YES NO

No such indication

12. If reactive or ignitable wastes are stored in covered tanks, are they in compliance with the National Fire Protection Association's buffer zone requirements?

YES NO

N/A

13. Are "No Smoking" signs posted?

YES NO

14. Have others measures been adopted to reduce hazards associated with storage of ignitable or reactive waste in tanks?

N/A
YES NO

- Explain

15. Waste Analysis and Trial Tests

Before treating and storing of hazardous waste in a tank is a detailed chemical and physical analysis of the waste obtained? *See response (V)(B)*

YES NO

16. Does the company have and follow a written waste analysis plan? *new was developed - dated 9/26/86*

YES NO

- a. Does the plan identify parameters used?

YES NO

Explain

- b. Sampling Method?

YES NO

Explain

- c. How frequent is analysis repeated?

YES NO

- d. Are results of waste analysis and trial tests placed in the facility's operating record. *Sample verification analyses each time received*

yes

17. Are waste analyses done when a tank is used to treat or store a HW which is substantially different or treated differently from waste previously treated or stored in the tank?

YES NO

K. Subpart K - Surface Impoundments (40 CFR 265.220)

1. Does this section apply to this facility? YES NO
2. Does the surface impoundment maintain enough freeboard to prevent any overtopping of the dike by overfilling, wave action, or a storm? YES NO
3. Are the surface impoundments designed and operated to allow two feet of freeboard? YES NO
4. Do earthen dikes have a protective cover which minimizes erosion (grass, rock, shale)? YES NO
5. Is a waste analysis or trial test conducted whenever a surface impoundment is used to chemically treat a HW which is substantially different or treated differently from waste previously treated in the surface impoundment? YES NO
6. Are results of waste analyses documented in the facility's operating record? YES NO
7. Are the surface impoundments inspected on a routine basis? How often? YES NO
8. Are ignitable or reactive wastes held in a surface impoundment (40 CFR 265.229)? YES NO
9. Comments:

The following 40 CFR Subparts do not have a specific checklist prepared because few of these types of facilities exists in Region X. Inspection made at facilities which operate any of the following would require the inspector to prepare an inspection checklist prior to the site visit.

- L. Subpart L - Waste Piles (40 CFR 265.250)
- M. Subpart M - Land Treatment (40 CFR 265.270)
- N. Subpart N - Landfills (40 CFR 265.300)
- O. Subpart O - Incinerators (40 CFR 265.340)
- P. Subpart P - Thermal Treatment (40 CFR 265.370)
- Q. Subpart Q - Chemical, Physical, and Biological Treatment (40 CFR 265.400)
- R. Subpart R - Underground Injection (40 CFR 265.430)

VI. Treatment, Storage, and Disposal (TSD) Permit Regulations (40 CFR 264) (Date Revised November 21, 1983)

This Part of the checklist does not have a specific checklist prepared because the checklist would be different for each facility. A compliance inspection made at a facility which has been issued a Part B Permit needs to have checklist and/or narrative which reviews all of the requirements of the facility's Permit. This checklist and/or narrative needs to be developed by the individual inspector.

HSWA Requirements

YES

NO

COMMENTS

Underground Tanks

1. If an underground product storage tank has been installed since May 7, 1985, does it comply with the following standards:

a. Will it prevent releases due to corrosion or structural failure for the operational life of the tank (280.2(a)(1))?

b. Is it cathodically protected against corrosion, constructed of non-corrosive material, or designed in a manner to prevent the release or threatened release of any stored substance (280.2(a)(2))?

c. Is it constructed or lined with material that is compatible with the substance to be stored (280.2(a)(3))?

2. Did the facility notify the State (or EPA if on Indian lands) by May 8, 1986, of any tank(s) in the ground as of January 1, 1974 (280.3)?

No underground
tanks installed
since 5/7/85

D. Stehnowie -
indicated - had
communication w/

L. Ashley of State Dept.
of Ecology - Agreed
oil/water separator not
an underground
tank

HSWA Requirements

Loss of Interim Status (§270.73)

	<u>YES</u>	<u>NO</u>	<u>COMMENTS</u>
1. For any units that lost Interim Status on Nov. 8, 1985, are any of those units still accepting RCRA hazardous waste?	_____	_____	N/A - not a land disposal facility
a. Which ones?			
b. What is the specific proof that the waste is RCRA-regulated? (obtain copies of on-site representative waste analyses; operating record showing discharges to unit; or any written documentation to clearly verify that the waste is RCRA-regulated).			
2. If the facility has ceased accepting hazardous waste, what was the last date on which RCRA hazardous waste was placed in such unit(s)? Where is this documented?			
3. Are any of the RCRA units now accepting waste that is non-hazardous or regulated only by the State?	_____	_____	
a. What is the evidence that the waste is not RCRA-regulated? (obtain copies of variances, waste analyses, etc.).			
4. If the facility is no longer receiving hazardous waste in a land disposal unit, please explain how the facility is currently managing their hazardous waste (e.g., tanks, discharge to sewer, etc.)			

HSWA Requirements

YES

NO

COMMENTS

Part 266, Subparts D and E

Prohibitions

1. Are mixtures of hazardous waste and used oil used for dust suppression (266.23)?
2. Is any hazardous waste fuel or off-specification used oil fuel burned in restricted (non-industrial) boilers or furnances (266.31(b) and 266.41(b))?
3. If the facility is a cement kiln located within the boundaries of a municipality of population greater than 500,000, and is not operating as a RCRA incinerator, are they burning hazardous waste fuel (266.31)?

Notification

1. Is the facility engaged in any of the following activities with respect to either used oil fuel or hazardous waste fuel 266.34 and 266.43:

- a. marketing?
- b. processing?
- c. burning?

If not, Part 266, Subparts D & E do not apply.

2. If so, has the facility notified EPA of those waste-as-fuel activities (in addition to their original notification (266.34(b), 266.35, 266.43(b), and 266.44)?

All processed used oil sent to PENOLCO
- use is 100%
MARINE diesel engine use

According to
D. Steinhilber

See exemption
50 FR 49193

	YES	NO	COMMENTS
<u>Storage</u>			N/A see ATTAS
If the facility handles hazardous waste fuel, is it stored in compliance with Part 265 (266.34(c))? (Effective 5/29/86)			
<u>Recordkeeping</u>			
A. Used Oil Fuel (UOF):			
1. If the facility is the first marketer to claim that the used oil fuel meets all the specifications listed in 266.40(e), do they have records of the analyses (or other adequate information) to document that claim (266.43(b)(6))? (Lead specification is not effective until 5/29/86)			N/A - see ABOVE Soils only for mobile use
2. Does all off-specification UOF meet the rebuttable presumption of mixing with hazardous waste (1,000 ppm total halogen) (266.40(c))?			Test all oil that is 50% or less bottom sediment + water w/ Doane Analyzer - According to facility RPS. if 1,000 chlorides retest - w/ commercial lab - if hwt waste fuel shipped to Georgetown facility - According to facility RPS
If not, the fuel is considered a hazardous waste fuel and must be handled as such. (See (B) below)			
3. Does the facility have copies of invoices for all off-spec. UOF shipments sent or received (266.43(b)(6) and 266.44(e))? (Effective 3/31/86)			Not determined
not described in the waste analysis RPS			

	<u>YES</u>	<u>NO</u>	<u>COMMENTS</u>
4. If the facility markets to a burner, or is itself a burner, do they have on record a copy of the burner's certification that they have notified EPA of waste-as-fuel activities and will only burn in unrestricted boilers or furnaces (i.e., industrial boilers and furnaces burning to recover useful heat energy, as specified in 261.41(b)), (266.43(b)(6) and 266.44(e))? (Effective 3/31/86)	_____	_____	<u>N/A</u>
B. Hazardous Waste Fuel (HWF):			
1. Does the facility have records of manifests for all shipments of hazardous waste fuel sent out or received (262.40, 264.71(a), and 265.71(a))? (Effective 3/31/86)	_____	_____	<u>No shipments of haz. waste fuel</u> <u>handled at</u> <u>the Louisville St.</u> <u>facility</u>
2. If the facility markets to a burner or is itself a burner, is there, on record, a copy of the burner's certification that they have notified EPA of waste-as-fuel activities and will only burn in unrestricted boilers and furnaces (i.e., industrial boilers and furnaces burning to recover useful energy, as specified in 266.31(b)), (266.34(f) and 266.35(e))?	_____	_____	<u>N/A</u>

HSWA Requirements

	<u>YES</u>	<u>NO</u>	<u>COMMENTS</u>
<u>Part 262</u>	<u> / </u>	<u> </u>	<u> </u>
1. If the facility generates between 100 and 1,000 kg/month, are all shipments off-site accompanied by a manifest (261.5)?	<u> / </u>	<u> </u>	<u> </u>
2. Does the generator sign the waste minimization certification on the manifest (Part 262, Appendix)?	<u> / </u>	<u> </u>	<u> </u>
3. Did the facility submit the required annual report on exports (due 3/1 each year) (262.50(d))?	<u> </u>	<u> </u>	<u>no exports indicated</u>
4. Does the operating record contain an annual certification by the permittee that:			<u>NA determined</u>
a. There is, to the extent economically practicable, a program in place to reduce the volume and toxicity of the hazardous waste that generates? <u>and</u>	<u> </u>	<u> </u>	<u> </u>
b. The proposed method of treatment, storage, or disposal is that practicable method currently available to the permittee which minimizes the present and future threat to human health and the environment (264.73(b)(9))?	<u> </u>	<u> </u>	<u> </u>

HSWA Requirements

Prohibition on Land Disposal of Liquids

	YES	NO	COMMENTS
1. Is the facility disposing of any noncontainerized or bulk liquid hazardous waste in any salt dome formation, salt bed formation, underground mine or cave (264.18(c) and 265.18)?	_____	<input checked="" type="checkbox"/>	_____
2. Is the facility landfilling any bulk or non-containerized liquid hazardous waste or free liquids contained in hazardous waste (266.314(b) and 265.314(b))?	_____	<input checked="" type="checkbox"/>	_____
3. Is the facility landfilling any non-hazardous liquid without approval of the Regional Administrator (264.314(e) and 265.314(e))?	_____	<input checked="" type="checkbox"/>	_____

HSWA Requirements

Parts 264 & 265 - Minimum Technological Requirements

	<u>YES</u>	<u>NO</u>	<u>COMMENTS</u>
<u>A. Landfills and Surface Impoundments</u>			
1. With respect to any surface impoundment or landfill, does the facility have any new unit, replacement of an existing unit or expansion of an existing unit which first received waste:			
After 11/8/84 and continued receiving waste on or after 5/8/85 (for facilities operating under Interim Status)?	_____	_____	_____
After the date of permit issuance (for facilities which received a <u>permit</u> after 11/8/84)?	_____	_____	_____
If no, this section does not apply.			
2. a. For any landfill, has the unit been granted one of the variances in §264.301(d) or (e) or §265.301(c) or (d)?			
b. For any surface impoundment, has the unit been granted one of the variances in §264.221(d) or (e) or §265.221(c) or (d)?	_____	_____	_____
If the unit has been granted one of the above variances, this section does not apply.			

N/A

	<u>YES</u>	<u>NO</u>	<u>COMMENTS</u>
3. Does such unit comply with the following minimum technological requirements (265.221(a) and 264.221(c) for the surface impoundments, and 265.301(a) and 264.301(c) for landfills):			
a. Is the unit lined with two or more liners?	_____	_____	_____
b. For surface impoundments, is there a leachate collection system installed between the liners (265.221(a))?	_____	_____	_____
c. For landfills, is there a leachate collection system installed above and between the liners (265.301(a))?	_____	_____	_____
d. Is the top liner designed, operated, and constructed of materials to prevent the migration of any constituent, <u>into</u> such liner during the period the facility remains in operation (including any post-closure monitoring period)?	_____	_____	_____
e. At a minimum, is the <u>lower</u> liner constructed of at least a 3-foot thick layer of recompacted clay or other material with a permeability of no more than 1×10^{-7} cm/sec.?	_____	_____	_____
f. Do the liners and leachate collection extend to any area of such unit that is in contact with the waste?	_____	_____	_____

	<u>YES</u>	<u>NO</u>	<u>COMMENTS</u>
4. For interim status landfills (265.301(b)) and surface impoundments (265.221(b)) that are subject to the above minimum technological requirements:			
a. Was EPA notified at least sixty days prior to the first date on which such unit received waste?			
b. Did the facility submit their Part B permit application within six months of EPA's receipt of that notice?			
B. <u>Waste Piles</u>			N/A
1. With respect to any interim status waste piles, does the facility have any new unit, replacement of an existing unit or expansion of an existing unit which first received waste after 11/8/84 and continued to receive wastes on or after 5/8/85 (265.254)?			
If no, this section does not apply.			
2. For any such waste pile that has not been granted a variance under 264.250(c) or 264.251(b), does such waste pile meet 264.251(a) liner and leachate control system requirements (265.254)?			

HSWA Requirements

Corrective Action Program Development

	<u>YES</u>	<u>NO</u>	<u>COMMENTS</u>
1. Does the facility have SWMU's? Assign each yes response a consecutive number. Describe unit in comments section.			Not determined — RCRA Facility Assessment to be conducted by EPA contractor / Facility representatives did identify a spill of bunker oil from tank 92 on 11/17/78
1. Landfill	___	___	
2. Surface Impoundment	___	___	
3. Land Farm	___	___	
4. Waste Pile	___	___	
5. Incinerator	___	___	
6. Storage Tank (above ground)	___	___	
7. Storage Tank (below ground)	___	___	
8. Container Storage Area	___	___	
9. Injection Wells	___	___	
10. Wastewater Treatment Units	___	___	
11. Transfer Stations	___	___	
12. Loading/Unloading Areas	___	___	
13. Waste Recycling Operations	___	___	
14. Waste Treatment Units	___	___	
15. Waste Detoxification Units	___	___	
16. Others	___	___	
2. Is there any indication of a possible release? (seeps, discolored soil, stressed vegetation, etc)			
1. SWMU 1	___	___	
2. SWMU 2	___	___	
3. SWMU 3	___	___	
4. SWMU 4	___	___	
5. SWMU 5	___	___	
6. SWMU 6	___	___	
7. SWMU 7	___	___	
3. Have any monitoring, sampling, closure activities or mitigation efforts occurred at any of the SWMU's? Attach copies of reports and data.			
1. SWMU 1	___	___	
2. SWMU 2	___	___	
3. SWMU 3	___	___	
4. SWMU 4	___	___	
5. SWMU 5	___	___	
6. SWMU 6	___	___	
7. SWMU 7	___	___	

was mistakenly overfilled —
approximately 9800 barrels spilled —
— Closed up area — some residual
soil cont. probable

OSWER 9918.1
Handler Name: A. Boy Chen Po Piao 91
ID Number: _____
Inspector: A. Boy
Date: 7/28/87

B. BDAT Treatability Group - Treatment Standards Identification

Comments

1. Did the generator correctly determine the appropriate treatability group [268.41] of the waste (Wastewaters containing solvents, pharmaceutical wastewaters containing spent methylene chloride, all other spent solvent wastes)?

☐ Yes ☐ No

C. Waste Analysis

1. Did the generator determine whether the waste exceeds treatment standards based on [268.7(a)]:

a. Knowledge of wastes ☐ Yes ☐ No

b. TCLP ☐ Yes ☐ No

c. Other (specify) _____

If knowledge, note how this is adequate:

If determined by TCLP, provide date of last test, frequency of testing, and attach test results.

Dates/frequency: _____

Note any problems: _____

- d. Were wastes tested using TCLP when a process or wastestream changed?

☐ Yes ☐ No

2. Did the F-solvent wastes exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?

☐ Yes ☐ No
☐ Some

3. Did the generator dilute the waste or the treatment residual so as to substitute for adequate treatment [268.3]

☐ Yes ☐ No

D. Management

1. Onsite management

a. Were F-solvent wastes managed onsite? ☐ Yes ☐ No

If yes, answer 1(b) and (c); if no, answer 2.

*NO such indication during inspection - from review of manifests, outfalls + records - & associated records
see attached*

Handler Name: Chem Pw - Pier 91
ID Number: _____
Inspector: A. Byo
Date: 7/25/87

- b. For wastes that exceed treatment standards, was treatment, storage, and/or disposal conducted?
____ Yes ____ No

Comments

If yes, TSDP Checklist must be completed.

- c. Are test results maintained in the operating record [264.74(b)3/265.73(b)(3)]?
____ Yes ____ No

2. Offsite Management

- a. If F-solvent wastes exceed treatment standards, did generator provide treatment facility [268.7(a)(1)]:

- (i) EPA waste number? ____ Yes ____ No
(ii) Applicable treatment standard? ____ Yes ____ No
(iii) Manifest number? ____ Yes ____ No
(iv) Waste analysis data, if available?
____ Yes ____ No

Identify offsite treatment facilities _____

- b. If F-solvent wastes did not exceed treatment standards, did generator provide the disposal facility [268.7(a)(2)]:

- (i) EPA Hazardous waste number? ____ Yes ____ No
(ii) Applicable treatment standard? ____ Yes ____ No
(iii) Manifest number? ____ Yes ____ No
(iv) Waste analysis data, if available?
____ Yes ____ No
(v) Certification that waste meets treatment standards? ____ Yes ____ No

Identify land disposal facilities receiving the BDAT certified wastes _____

Handler Name: Chen Po-Ping
 ID Number: _____
 Inspector: A. Bay
 Date: 7/28/87

- c. If waste is subject to nationwide variance [268.30] (e.g., solvent-water mixtures less than 1%), case-by-case extension [268.5] or petition [268.6] does generator provide notice to disposer that waste is exempt from land disposal restrictions [268.7(a)(3)]?
 _____ Yes _____ No

Comments

E. Storage of F-Solvent Waste

1. Was F-solvent waste stored for greater than 90 days (after variance 180/270 days for SQG) [268.50(a)(1)]?
 _____ Yes _____ No
- If yes, was facility operating as a TSD under interim status or final permit?
 _____ Yes _____ No

If yes, TSD Checklist must be completed.

F. Treatment Using RCRA 264/265 Exempt Units or Processes (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, etc.)

1. Were treatment residuals generated from RCRA 264/265 exempt units or processes?
 _____ Yes _____ No

If yes, list type of treatment unit and processes

If the residuals from a RCRA-exempt treatment unit are above the treatment standards, the owner/operator is considered a generator of restricted waste. The inspector should determine whether the generator requirements, particularly waste identification requirements, have been met for the treatment residuals.



N/A

California List Waste

1) Does the handler generate the following wastes?

not indicated

Wastes generated since 7/8/87 limited to tank bottom sludges - a spot paint cleaner - classified as D001 waste per California

- a. Liquid hazardous wastes having a PH less than or equal to two [2.0]? Y N
- b. Liquid hazardous wastes containing polychlorinated biphenyls (PCBs) at concentrations greater than or equal to 50 ppm? Y N
500 ppm? Y N
- c. Liquid hazardous wastes that are primarily water and contain halogenated organic compounds (HOCs) in total concentration greater than or equal to 1000 mg/l and less than 10,000 mg/l HOCs? Y N

2) a. Is the Paint Filter Liquids Test (PFLT method 9095) performed as described by SW-846 to determine whether waste is in liquid form? *not determined* Y N

b. Did facility obtain representative chemical and physical analysis of wastes and residues [264.13(a) 265.13(a)]? *of bottom sludges* Y N

3) If waste was determined to be in liquid state according to PFLT, was waste solidified using an absorbent? Y N

4) What type absorbent was used? *Super fine fly ash & Lime*

5) What type of waste was absorbent added to (refer to question 1)? (Check where applicable) *Tank Bottom Solids (unless resulting from listed waste - may not be a hz. waste)*

- a. Liquid hazardous waste having a PH less than or equal to 2
- b. Liquid hazardous waste containing PCB in concentrations greater than 50 ppm ; greater than 500 ppm *indications of PCB cont to GPRS*
- c. Liquid hazardous waste containing HOCs in concentrations greater than or equal to 1000 mg/l and less than 10,000 mg/l

See attached waste profile prepared for CSEI

6) Did handler determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether waste has a PH less than or equal to two [2.0] based on:

- a. Knowledge of wastes Y N
- b. Testing Y N
List method *not determined*

If knowledge, note how this is adequate:

- 7) a. Did handler determine if concentration levels* in PFLT extract exceed cyanide & metals treatment standards? Y N *not consider testing*
- b. List test method used. _____
- c. List constituent and concentration level which exceeded prohibition levels. _____
- 8) Did generator treat waste on-site or send off-site (Identify off-site facility)? Solidified on site off-site disposal - CSSI Amherst, OR
- 9) If waste was determined to be restricted from land disposal (i.e., liquid, exceeding concentration levels and/or PH less than 2.0) did handler provide treatment facility: N/A
- (i) EPA waste number? Y N *Liquid not shipped*
- (ii) Specified treatment standard? Y N
- (iii) Manifest number? Y N
- (iv) Waste analysis data, if available? Y N
- 10) Did generator/treater dispose of waste on-site or send off-site? off-site
- Identify off-site disposal facility CSSI - Amherst, OR
- 11) If waste was determined not restricted from land disposal, did handler provide disposal facility with: N/A
- (i) EPA hazardous waste number? Y N
- (ii) Manifest number? Y N
- (iii) Waste Analysis Data, if available? Y N
- (iv) Specified treatment standard? Y N
- (v) Certification that waste passed PFLT (non-liquid), or does not exceed specified prohibition levels? Y N
- 12) Are restricted wastes containing PCBs (i.e., concentration greater than or equal to 50 ppm) stored greater than 1 yr? Y N
- 13) Does facility handle any of the following waste:
- a.
- (i) Waste containing HOC greater than or equal to 1000 mg/kg (non-liquid hazardous waste) Y N
- (ii) Waste containing HOC greater than or equal to 10,000 mg/l (liquid hazardous waste) Y N *not indicated*
- (iii) Waste containing HOC greater than 1000 mg/l and less than 10,000 mg/l and are not dilute HOC waste water? Y N *not indicated*

* Cyanide and metals concentration levels not yet codified in Regulation. Statutory levels under 3004(d)(2) should be used.

If yes, answer 13(b) and (c), if no, answer 14.

- 13) b. Is any waste listed in 13(a) disposed of in a land fill or surface impoundment? _____ Y _____ ☒ N

If yes, continue, if no answer 14.

- c. Is facility in compliance with section 268.5(h)(2) [New, replacement, or laterally expanded units must meet minimum technology requirements] and section 264 & section 265 Subpart F ground-water monitoring requirements? _____ Y _____ N

- 14) If facility handles any liquid hazardous waste containing PCB complete the following section:

- a. List concentration levels of PCB in waste stream(s)
_____ 33 to 1.2 ppm PCBs _____ (ppm)

- b. Describe method of treatment/disposal of wastes(s) listed in section (a) and identify facility receiving this waste

Stored - Shipper + Chem Pro - Tacoma -
8/12/87

- c. Does facility perform any type of mixing of PCB containing liquid hazardous waste with same or other types of wastes or liquids? _____ Y _____ ☒ N

- d. If yes, state reason for mixing: _____ No such mixing indicated _____